



Genova Burns LLC  
494 Broad Street, Newark, NJ 07102  
**Tel:** 973.533.0777 **Fax:** 973.533.1112  
**Web:** [www.genovaburns.com](http://www.genovaburns.com)

Donald W. Clarke, Esq.  
Partner  
Member of the NJ & NY Bar  
[dclarke@genovaburns.com](mailto:dclarke@genovaburns.com)  
Direct: 973-387-7804

June 6, 2023

*Via PACER*

Honorable Robert Kirsch, U.S.D.J.  
United States District Court  
Clarkson S. Fisher Building & U.S. Courthouse  
402 East State Street  
Trenton, NJ 08608  
Courtroom 4E

**Re: Official Committee of Unsecured Creditors v. BlockFi, Inc., et al.**  
**U.S.D.C. D.N.J. Case No.: 23-03015-RK**  
**U.S.B.C. D.N.J. Case No.: 23-01144-MBK**

Dear Judge Kirsch:

This firm serves as counsel to the Official Committee of Unsecured Creditors (the “Committee”) in the chapter 11 bankruptcy case for the debtor and defendant, BlockFi, Inc. (“BlockFi”), in the above-referenced proceedings. Currently, there is a return date of July 3, 2023, for defendant, the United States of America’s, motion to withdraw the reference from the District Court of New Jersey to the Bankruptcy Court for the District of New Jersey (the “Motion”). We write to inform Your Honor that the parties have conferred and have agreed to a truncated briefing schedule.

The parties have agreed that the deadline for the Committee and BlockFi to respond to the Motion shall be June 12<sup>th</sup>, and the deadline for the United States of America to file a reply is June 20<sup>th</sup>. The parties respectfully request that, in light of the agreed briefing schedule and contingent on Your Honor’s availability, Your Honor hear this matter earlier than July 3<sup>rd</sup>.



We look forward to Your Honor's input and will make ourselves available to discuss at Your Honor's convenience.

Respectfully submitted,

**GENOVA BURNS LLC**

*/s/ Donald W. Clarke*

DONALD W. CLARKE

cc: Richard Kanowitz (richard.kanowitz@haynesboone.com)  
Kenneth J. Aulet (kaulet@brownrudnick.com)  
Shari I. Dwoskin (sdwoskin@brownrudnick.com)  
E. Patrick Gilman (pgilman@brownrudnick.com)  
Seth Shapiro (seth.shapiro@usdoj.gov)  
Adrienne Rosen (adrienne.rosen@usdoj.gov)